

**Gravatt, Dan**

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**From:** Tapia, Cecilia  
**Sent:** Monday, December 02, 2013 10:43 AM  
**To:** Gravatt, Dan; Asher, Audrey; Field, Jeff; Jefferson, Matthew  
**Cc:** Whitley, Christopher; Thomas, Hattie; Washburn, Ben; Kring, Debbie  
**Subject:** FW: EPA Request to Continue GCPT work /Briefing for EPA Officials  
**Attachments:** 2013 11 27 Work Plan Update.pdf

Also saved on H drive

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**From:** Merrigan, Jessie (LG) [mailto:JMerrigan@LATHROPGAGE.COM]  
**Sent:** Wednesday, November 27, 2013 3:21 PM  
**To:** Tapia, Cecilia; Asher, Audrey  
**Cc:** Cozad, David; Hammerschmidt, Ron; Hague, Mark; Brooks, Karl; Beck, Bill (LG)  
**Subject:** RE: EPA Request to Continue GCPT work /Briefing for EPA Officials

Good afternoon Cecilia,

Please find attached the follow up we discussed today in response to your email below. Our technical team looks forward to scheduling a time to talk with your team early next week and I will plan to follow up with Audrey regarding scheduling for the meeting the week of December 9th.

We appreciate EPA's assistance and look forward to working with you. As always, please let us know if you have questions or need additional information. We look forward to talking with you next week and hope you have a good holiday weekend.

Thank you,  
Jessie

**LATHROP  
& GAGE**

**Jessica E. Merrigan**

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**From:** Tapia, Cecilia [<mailto:Tapia.Cecilia@epa.gov>]  
**Sent:** Wednesday, November 27, 2013 11:09 AM  
**To:** Merrigan, Jessie  
**Cc:** Asher, Audrey; Cozad, David; Hammerschmidt, Ron; Hague, Mark; Brooks, Karl  
**Subject:** EPA Request to Continue GCPT work /Briefing for EPA Officials  
**Importance:** High

Dear Jessie,

As we discussed yesterday, EPA is requesting that Republic Services continue GCPT work to define the southern boundary of the barrier alignment. My understanding per our conversation is that Republic will mobilize on or about December 2, 2013 to continue GCPT investigatory work. I have already arranged for EPA oversight that week. In addition, you indicated that you would like to phase the coring work to begin on or about December 9<sup>th</sup> to obtain analytical samples in areas where GCPT field detections were above established action levels. Prior to and during the coring work, we are requesting that on-site air monitoring be conducted since samples will be brought to the surface. EPA also intends to establish conditions and expectations for an air monitoring network for any work where there will be soil disturbance of buried materials. We will be submitting comments on the Coring work plan shortly.

Since the sequencing of work has changed, we are also requesting that the PRP group provide a status report for our EPA Senior Officials in our Lenexa Regional Office the week of December 9<sup>th</sup>. You may coordinate a mutually agreeable time with Audrey Asher.

Please confirm the above noted requests as soon as possible.

Thanks  
Cecilia Tapia  
Director, Superfund



November 27, 2013

Ms. Cecilia Tapia  
Director  
Superfund Division  
**United States Environmental Protection Agency**  
Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

RE: Bridgeton Landfill – Response to EPA Request to Continue GCPT Work

Dear Ms. Tapia:

On behalf of our client, Bridgeton Landfill, LLC (hereinafter Bridgeton Landfill), Feezor Engineering, Inc. (FEI) hereby submits this response to EPA's November 27, 2013, email requesting the continuation of Phase 1 Gamma Cone Penetrometer Test (GCPT) investigation.

EPA's email requested Bridgeton Landfill "continue GCPT work to define the southern boundary of the barrier alignment," and requested mobilization on December 2, 2013. However, because of scheduling and technical concerns, it will not be possible to conduct the additional GCPT borings beginning on Monday. We wanted to update you on the status and next steps, and would be interested in having a phone conference early next week when your team is back in the office in order to coordinate on the next steps of the investigation.

As EPA is aware, the initial phase of the GCPT study did encounter elevated gamma readings outside the originally expected area. However, we do not yet have the lithology to have a detailed understanding of the makeup of the layer in which those readings were found. Additionally, we do not yet have laboratory analytical data to confirm the source of the gamma activity. Given the proximity of these borings to samples associated with earlier studies, laboratory analytical data would help establish the level of isotopes of interest and the concentration relative to other detections and unrestricted use. As discussed below, we had planned to conduct an initial round of coring to gather this data.

We share EPA's interest in defining the southern boundary of the barrier alignment but do not think that continuation of the GCPT offers the best means of accomplishing this.

The GCPT is a useful tool in relatively flat and shallow areas, like the area planned for the investigation. However, there are substantial technical and instrumentation challenges presented by dealing with deeper borings like those expected south of the current borings, and work on non-level surfaces like the slope of the North Quarry. Based upon this, we are not confident that we would be able to successfully complete an investigation to the south using the GCPT. Additionally, borings south of the current borings may involve boring through the certified cap on the North Quarry landfill, an activity for which we would require approval from MDNR and one which we would seek to minimize to the maximum extent possible to preserve functionality of the cap. Because of these complications, we consider it necessary to gather additional analytical data in order to develop the next phase of the investigation.

FEI had been preparing for submission an Addendum 1 to the November 15, 2013 *Core Sampling (Phase 2) Work Plan* (hereinafter referred to as the Phase 2 Work Plan). This addendum would have proposed the locations of the sonic borings based upon results thus far of the GCPT field investigation. As discussed with EPA, the Phase 2 locations will be proposed based upon the following informational needs:

- It is necessary to obtain an understanding of the base of the OU-1 landfill, particularly in the eastern portion of the landfill;
- It is necessary to compare the slightly elevated gamma results from the GCPT to analytical data for the 8 known isotopes;
- It is necessary to understand the elevated gamma results from the GCPT investigation by obtaining analytical data for the 8 known isotopes; and
- It is necessary to compare a known unimpacted GCPT sounding to the analytical data for the 8 known isotopes to assist with the background determination for the non radiological impacted waste and in-situ soils.

As noted in the Phase 2 Work Plan, these borings were to be accomplished through sonic drilling. By email today, EPA has requested on-site air monitoring be conducted prior to and during the coring. Based upon this, we will wait on proposing and initiating the Phase 2 sampling until we have the opportunity to work with EPA to address this request.

We understand that your technical team is not available to discuss this today. We wanted to provide a timely response in order to allow you to plan resources for next week. As discussed earlier today, at this point we expect on-site activities next week to be limited to demobilization of the GCPT rig due to its being scheduled for use elsewhere. We are available at your convenience to discuss planning and next steps to develop and prepare for the next phase of this investigation.

November 27, 2013

If you have any questions, please feel free to contact me at (217) 483-3118 or Bridgeton Landfill's Environmental Manager Brian Power at (314) 744-8165.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan R. Feezor". The signature is fluid and cursive, with the first name "Dan" being the most prominent.

Daniel R. Feezor, P.E.

**Feezor Engineering, Inc.**

dfeezor@feezorengineering.com

cc Dan Gravatt, USEPA Region 7  
Ron Hammerschmidt, USEPA Region 7  
Audrey Asher, USEPA Region 7  
Jeff Field, USEPA Region 7  
Brian Power, Bridgeton Landfill, LLC